

RCRA areas held F-listed wastes in containers and piping, any releases to secondary containment would have been cleaned up promptly because of the high level of radionuclides in the wastes, and the floors were washed/rinsed prior to shaving, with the rinsate data supporting a "contained out" determination for the debris. In addition, a previous sample of floor shaving debris from H Module, comprised of paint and concrete, also was below TCLP levels for all metals.

Mr. Ainscough has concurred that these RCRA units in Building 707 have been closed by removal, and has concurred that the floor shaving debris may be managed as non-hazardous low-level waste for disposal, based on the project conducting the appropriate decontamination and removal activities.

#### Floor Trench

The floor trench from A module to C pit is a metal pipe embedded in the concrete floor slab, which previously contained an inner waste transfer pipe. The floor trench has had the ends grouted, and will be removed during demolition of the floor slab and managed as low level waste. This agreement is documented in a Contact Record between Dyan Foss and Edd Kray dated August 2, 2004. Mr Ainscough has concurred that the rinsate results are adequately protective and this floor trench is closed under RCRA, contingent on removal and disposal as low level waste.

#### Building 778 Hallway

The portion of the 778 hallway between Corridor D in Building 707 and the breezeway connecting to Building 777 meets the radiological unrestricted release criteria, and will not be shaved prior to demolition. A review of the RFETS Release Database from January 1990 through the present and the Environmental Compliance Action Tracking System (ECATS) from June 1995 through the present listed no spills or releases from this transfer line. Any releases to secondary containment that may have occurred prior to 1990 or that were not listed in the site databases would have been addressed promptly to mitigate the release of high level radionuclides within the waste streams. Although the hallway contained piping with F-listed wastes, no radiological contamination is present, and the rinsate data supports the determination that the floor is not characteristic waste as well as supporting a "contained out" determination for the listed waste. Mr. Ainscough concurred that this area has been closed under RCRA, contingent on final disposition of the building by removal. The waste will be managed as non-hazardous sanitary waste for disposal.

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**Contact Record Prepared by:** Carolyn Hicks

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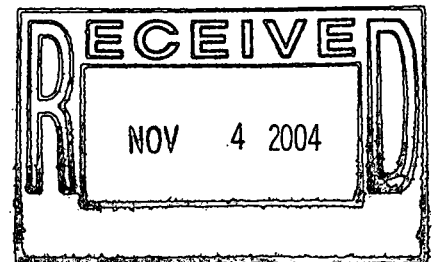
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